

30th April 2015

Submission to the National Disability Insurance Agency concerning the *Proposal for a National Disability Insurance Scheme Quality and Safeguarding Framework*.

Thankyou for the opportunity to comment on the *Proposal for a National Disability Insurance Scheme Quality and Safeguarding Framework*. This submission is in relation to the section titled “Ensuring staff are safe to work with participants”.

The stated aim of the safeguards outlined in this section of the proposal are to:

- reduce the potential for people who pose a risk to participants being employed in supports funded through the NDIS
- remove those proven to pose a risk to participants
- send a strong signal about the priority placed on the right of people with disability to be safe.

Four options, or possible approaches are proposed for consideration:

Option 1: risk management by employers

Option 2: referee checks and police checks

Option 3: working-with-vulnerable-people clearances

Option 4: creation of a barred persons list

These stated aims and the associated options are all appropriate. However, they fall short of the comprehensive approach that is required to not only provide ‘safeguards’, but also promote and ensure the provision of ‘quality services’.

In recent years, debate and discussion has occurred about the knowledge, skill and standards of professionalism required of the disability workforce in Australia (cf Productivity Commission, July 2011). These discussions have included consideration of both practical practice standards and ethical standards. They have been informed by directions taken in the United States of America (e.g., US Alliance of Direct Support Professionals) and in United Kingdom (e.g., UK General Social Care Council).

In 2006, the National Disability Administrators (NDA) commissioned a review into disability workforce issues. Among the findings, it was recommended “consideration be given to adopting a national approach to qualifications, particularly in relation to entry level qualifications, to raise the profile of the sector and to accelerate the professionalisation of the sector”. There is currently a national qualifications

framework to inform curriculum development for the voluntary certification of the direct support workforce (e.g., Community Services & Health Industry Skills Council Training Package).

However, there is no nationally recognised professional body or scheme to accredit, at a professional level, these programmes or the graduates of these programmes. So too there is no accreditation body to provide recognition of qualifications equivalent to these programmes, acknowledging that professional development in the disability services industry involves experience as well as formal training.

The lack of national accreditation for the disability workforce is in contrast to developments in other areas of human service practice and the trades sector. For example, Australia now has a national Australian Health Practitioner Regulation Agency, and is developing national approaches to the accreditation and regulation of other occupations. These schemes have the dual role of protecting the public and ensuring standards of education and practice in which the public can have confidence. Registration and re-accreditation processes also enable consumers (individuals and employing agencies) to make informed decisions about the people they hire, and provide recourse when poor or dangerous practice becomes apparent.

Accreditation and registration schemes also provide an important role in creating an identity for the various trades and professions, and in turn attract people to aspire to join the profession or trade. For most professions and trades subject to registration, accreditation also brings with it the incentives (requirements) for people to pursue on-going professional development.

Importantly, with the impetus of the National Disability Insurance Scheme [NDIS], the disability sector is gradually moving into a more individualised consumer driven market place. Individual consumers will take on greater responsibility for retaining their direct support staff. However, there is currently no nationally recognised mechanism to differentiate member of the workforce who hold a variety of experience and qualifications.

The attached report provides a model for the way forward, and options for the establishment of a national registration and accreditation scheme for the direct support workforce. It arises from a project initially funded under the inaugural *Practical Design Fund*. The project was conducted as a national consultation, with a collaboration between Cootharinga North Queensland, AVANA, Australasian Disability Professionals and Deakin University. We respectfully submit the attached report for consideration, and would be pleased to discuss it further.

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